

EDWARDS WILDMAN PALMER LLP  
Brian J. Green (BG 5761)  
James T. Killelea (JK 3153)  
Attorneys for Defendant  
Care Professional Liability Association LLC  
750 Lexington Avenue  
New York, New York 10022  
212.308.4411

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
IMAGINE INTERNATIONAL REINSURANCE  
LIMITED,

Plaintiff,

11 Civ. 9531 (NRB)

-against-

CARE PROFESSIONAL LIABILITY ASSOCIATION,  
LLC, f/k/a CARE PROFESSIONAL LIABILITY  
ASSOCIATION HOLDINGS, LLC

**DEFENDANT'S RULE 26 INITIAL  
DISCLOSURES**

Defendant.  
-----X

Defendant Care Professional Liability Association LLC, f/k/a Care Professional Liability Association Holdings, LLC ("Care"), by its attorneys, Edwards Wildman Palmer LLP, without waiver of any available privileges or immunities, hereby provides initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1) as follows:

**(A) Identity of Persons with Discoverable Information:**

NAME	ADDRESS	SUBJECT MATTER
Greg Cook	c/o Edwards Wildman Palmer LLP	Information related to the transaction at issue.

Care's investigation of the facts and circumstances relating to this proceeding is ongoing, and other persons with knowledge may be identified later in the litigation. Care will supplement this disclosure as appropriate under the Federal Rules of Civil Procedure.

**(B) Relevant Documents:**

Based on current information, Care has certain documents in its possession, custody, or control, that it may use to support its defenses and claims and will produce those documents in accordance with the appropriate deadlines.

Care's investigation of the facts and circumstances relating to this action is ongoing, and it may identify other documents later in the litigation. Care will supplement this disclosure as appropriate under the Federal Rules of Civil Procedure.

**Location:**

CARE Professional Liability Association, LLC  
9300 Shelbyville Road, Suite 204  
Louisville, Kentucky 40222

**Description by Category:**

Documents regarding the transaction at issue and the Start-Up Agreement at issue.

**(C) Computation of Damages:**

Other than costs, disbursements and attorneys' fees associated with the defense of this action, the total amount of which cannot yet fully be calculated, Care is not presently seeking any damages.

**(D) Insurance:**

None.

Care reserves the right to supplement these disclosures.

Date: March 30, 2012  
New York, New York

EDWARDS WILDMAN PALMER LLP

By: 

Brian J. Green (BG 5761)

James T. Killelea (JK 3153)

Attorneys for Defendant  
Care Professional Liability Association LLC  
750 Lexington Avenue  
New York, New York 10022  
212.308.4411